

EXHIBIT F

From: Stewart, Doug <doug.stewart@bracewell.com>
Sent: Thursday, January 20, 2022 6:39 PM
To: oceansemi-dlf
Cc: Bracewell-IP; Timothy Devlin; DLF-Lit Paras; Henrik Parker
Subject: Ocean Semiconductor--reissued subpoenas

Counsel:

We have been informed by our client, Kioxia America Inc., that the eight subpoenas which were the subject of our recent motions to quash have been reissued and served. While we appreciate that you have corrected the location of production/deposition to comply with the rules, it appears that the newly-issued subpoenas are of substantially the same scope as the originals. As laid out in our previously-filed motions, the scope of the subpoenas are grossly overbroad and responding to the subpoenas in their current form would subject Kioxia America to undue burden. Because we previously raised this problem in our motions, but you took no corrective action to address it prior to reissuing the subpoenas, we presume that you intend to stand by your overreaching demands. If that is the case, we will refile our motions to quash. Therefore, please confirm if that is your intent. If it is not, please propose how you intend to narrow the requests. We are willing to discuss your proposal on a meet and confer next week.

Thanks,

Doug

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